

**TECHNICAL MEMORANDUM**

**To:** Steven Maslowski, USEPA Region 3  
**From:** Tom Rowlett, PG Environmental  
**Date:** 01/12/2020  
**Subject:** Draft Review – Capitol Region Water Nine Minimum Controls Plan

PG was tasked by USEPA to review the Nine Minimum Controls Plan (NMC Plan) dated August 2019 prepared by Capital Region Water (CRW). This Plan appears to be in general conformance with USEPA's 1995 Combined Sewer Overflow (CSO) NMC Policy with some exceptions. Following are PG's comments regarding the overall conformance of the CRW NMC Plan to CSO Policy requirements:

**Minimum Control #1 – Review of Operation & Maintenance Program**

**Section 1.2.2.2 – Field Maintenance Equipment:**

**Ex. 7(A)**

**Section 1.2.3 – Remedial Work Prioritization:**

**Ex. 7(A)**

**Section 1.4.1 – O&M of CSO Regulator Structures - Inspection Procedures/Schedules:**

**Ex. 7(A)**

**Ex. 7(A)**

Section 1.4.2 – Remedial Procedures and Schedules:

- Ex. 7(A)**

Section 1.5.1 – O&M of Outfalls/Backflow Prevention Gates - Inspection Procedures/Schedules:

- Ex. 7(A)**

Section 1.6.1 – O&M of Interceptors - Inspection Procedures/Schedules:

- Ex. 7(A)**

Section 1.7.1 – O&M of Pump Stations - Inspection Procedures/Schedules:

- **Ex. 7(A)**

Section 1.8.1 – O&M of Force Mains - Inspection Procedures/Schedules:

- **Ex. 7(A)**

Section 1.9.1 – O&M of Collection System Sewers - Inspection Procedures/Schedules:

- **Ex. 7(A)**
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Section 1.9.3 – O&M of Collection System Sewers – Documentation of Current Control Practices:

- **Ex. 7(A)**

Section 1.10.1 – O&M of Inlets/Catch Basins – Inspection Procedures/Schedules:

- **Ex. 7(A)**

- **Ex. 7(A)**

**Minimum Control #2: Maximum Use of the Collection System for Storage:**

**Section 2.2 – Combined Sewer Inspection:**

- **Ex. 7(A)**

**Section 2.4 – Adjustment of Regulator Settings:**

- **Ex. 7(A)**

**Section 2.5 – Installation of In-System Controls:**

- **Ex. 7(A)**

**Minimum Control #3 – Review & Modification of Industrial Pretreatment Programs:**

- **Ex. 7(A)**

**Minimum Control #4 – Maximize Flows to the POTWs:**

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**Ex. 7(A)**

**Minimum Control #5 – Prohibiting CSO Discharges During Dry Weather:**

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**Ex. 7(A)**

**Minimum Control #6 – Control of Solid and Floatable Material in CSO Discharges:**

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**Ex. 7(A)**

**Minimum Control #7 – Pollution Prevention Programs:**

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**Ex. 7(A)**

**Minimum Control #8 – Public Notification:**

**Ex. 7(A)**

**Minimum Control #9 – Inspection, Monitoring, and Reporting:**

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**Ex. 7(A)**